

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
Eastern Division**

In re:)	Bankr. Case No.: 17-60018-rk
)	
BRIAN EVANS KNEPP and)	Chapter 7
NICOLE JEAN BELOPOTOSKY,)	
)	
Debtors.)	Hon. Russ Kendig
_____)	
)	
BRIAN EVANS KNEPP and)	Adv. Proc. No.: 17-06009
NICOLE JEAN BELOPOTOSKY,)	
)	
Plaintiffs,)	
)	
v.)	
)	
NAVIENT, NATIONAL COLLEGIATE)	
STUDENT LOAN TRUST 2003-1,)	
FEDERAL LOAN SERVICING, UNITED)	
STATES ATTORNEY, ATTORNEY)	
GENERAL OF THE UNITED STATES,)	
and UNITED STATES OF AMERICA)	
)	
Defendants.)	

**NOTICE OF NAVIENT SOLUTIONS, LLC'S MOTION TO DISMISS
"NAVIENT" AS A DEFENDANT IN THIS ADVERSARY PROCEEDING
OR IN THE ALTERNATIVE FOR SUMMARY JUDGMENT DISMISSING
"NAVIENT" AS A DEFENDANT IN THIS ADVERSARY PROCEEDING**

Navient Solutions, LLC has filed a Motion to Dismiss "Navient" as a Defendant or in the Alternative for Summary Judgment Dismissing "Navient" as a Defendant in this Adversary Proceeding, and related papers with the court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one. If you do not want the court to grant the relief sought in the Motion, then on or before **fourteen (14) days from the date set forth in the certificate of service for the Motion**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to (address of bankruptcy court clerk's office) OR your attorney must file a response using the court's ECF System.

The court must **receive** your response on or before the above date. You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. Mail to:

Phyllis A. Ulrich, Esquire
Christopher P. Kennedy, Esquire
Chagrin Professional Plaza
24755 Chagrin Boulevard, Suite 200
Cleveland, OH 44122

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief without further hearing or notice.

Respectfully submitted,

By: /s/ Phyllis A. Ulrich
Phyllis A. Ulrich, Esquire # 0055291
Christopher P. Kennedy, Esquire # 0074648
CARLISLE, MCNELLIE, RINI, KRAMER &
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24755 Chagrin Boulevard, Suite 200
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Telephone: (216) 360-7200
Facsimile: (216) 360-7212
E-mail: bankruptcy@carlisle-law.com
Attorneys for Navient Solutions, LLC

CERTIFICATE OF SERVICE

I certify that on April 26, 2017, a true and correct copy of Navient Solutions, LLC's Notice of Motion to dismiss "Navient" as a Defendant in this adversary proceeding or in the Alternative, For Summary Judgment dismissing "Navient" as a Defendant in this adversary proceeding and Notice of Motion was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Edwin H. Breyfogle via electronic mail (ECF) at edwinbreyfogle@gmail.com

By: /s/ Phyllis A. Ulrich
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